

EXHIBIT F

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14
15 *Attorneys for Defendants Thomson SA and
Thomson Consumer Electronics, Inc.*

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19
20 IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

No. 07-cv-5944-SC

MDL No. 1917

21 This Document Relates to:

22 *Sharp Electronics Corp., et al. v. Hitachi Ltd.,*
23 *et al.*, No. 13-cv-1173;

24 *Electrograph Systems, Inc., et al. v. Technicolor*
25 *SA, et al.*, No. 13-cv-05724;

26 *Siegel v. Technicolor SA, et al.*, No. 13-cv-
05261;

27 *Best Buy Co., Inc., et al. v. Technicolor SA, et*
28 *al.*, No. 13-cv-05264;

**THOMSON SA'S RESPONSES TO
DIRECT ACTION PLAINTIFFS' FIRST
SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS**

1 *Target Corp. v. Technicolor SA, et al.*, No. 13-
cv-05686;

2 *Interbond Corporation of America v.*
3 *Technicolor SA, et al.*, No. 13-cv-05727;

4 *Office Depot, Inc. v. Technicolor SA, et al.*, No.
13-cv-05726;

5 *Costco Wholesale Corporation v. Technicolor*
6 *SA, et al.*, No. 13-cv-05723;

7 *P.C. Richard & Son Long Island Corporation,*
8 *et al. v. Technicolor SA, et al.*, No. 13-cv-
05725;

9 *Schultze Agency Services, LLC v. Technicolor*
10 *SA, et al.*, No. 13-cv-05668;

11 *Sears, Roebuck and Co. and Kmart Corp. v.*
Technicolor SA, et al., No. 13-cv-05262;

12 *Tech Data Corp., et al. v. Hitachi Ltd., et al.*,
13 No. 13-cv-00157.

14 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant Thomson SA
15 hereby responds to the First Set of Requests for Production of Documents propounded by the
16 Plaintiffs in the above-captioned cases ("Plaintiffs") as follows:

17 GENERAL OBJECTIONS

18 1. Thomson SA and its counsel are continuing their investigation of this matter.

19 2. Thomson SA's present responses are based on information known as of this time.
20 Thomson SA makes these responses without prejudice to its right to supplement them, as
21 necessary, based on subsequently acquired information or knowledge, whether gained through
22 Thomson SA's continued investigation or the investigation of others.

23 3. Thomson SA objects to each and every request to the extent it seeks documents
24 regarding Thomson SA's former CRT and/or CRT Finished Product business as overbroad and
25 unduly burdensome because Thomson SA exited the CRT and CRT Finished Product industry in
26 2005, when its CRT related assets and personnel were transferred to Videocon. As such, much
27 of the evidence and many of the witnesses who may have possessed information regarding these
28 businesses is difficult, if not impossible, for Thomson SA to locate, access, and obtain. And,

1 even if Thomson SA is able to obtain documents regarding these businesses, most of the former
2 Thomson SA personnel needed to explain and interpret them have long since left the company,
3 making it all the more difficult for Thomson SA to determine if such documents are responsive
4 to Plaintiffs' requests. Moreover, by waiting to file their instant claims until 2013, over six year
5 after the first claims were filed in this case, the Plaintiffs have exacerbated these difficulties.

6 4. Thomson SA objects to Plaintiffs' requests, definitions, and instructions to the
7 extent they seek the discovery of documents or information regarding the sale of CRTs or
8 finished products containing CRTs outside of the United States and unrelated to United States
9 commerce on the grounds that they are overbroad, unduly burdensome, irrelevant, and not
10 reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the
11 scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United
12 States, and beyond the jurisdiction or reach of the laws of any State.

13 5. Thomson SA objects to each request, definition, or instruction to the extent it
14 seeks documents or information regarding conduct outside the applicable statute(s) of limitations
15 on the grounds that such documents and information are neither relevant to any claims or
16 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
17 evidence.

18 6. In making these responses, Thomson SA does not concede the relevancy or
19 materiality of any of Plaintiffs' requests for production nor does Thomson SA concede the
20 relevancy or materiality of any of the subjects to which those requests relate or refer.

21 7. To the extent any request, definition, or instruction may be construed as calling
22 for the disclosure of privileged or immune information, including, without limitation,
23 information subject to the attorney-client privilege, common-interest privilege, work-product
24 doctrine, joint defense privilege, and/or any other privilege or immunity from discovery,
25 Thomson SA hereby claims such privileges and protections and objects to the disclosure of any
26 documents or information subject thereto. Thomson SA will not produce such privileged or
27 protected documents, materials, or information and states that to the extent any such documents,
28

1 materials, or information are produced, the production is inadvertent and not intended to waive
2 those privileges or protections.

3 8. To the extent any request, definition, or instruction may be construed as seeking
4 the disclosure of confidential trade secrets, financial, commercial, strategic, or otherwise
5 proprietary or confidential information, Thomson SA objects to the disclosure of any such
6 documents or information. To the extent any such material is produced in this action, Thomson
7 SA reserves the right to appropriately designate it pursuant to the protective order in place in this
8 action, and to seek such additional terms and protections as may be appropriate. Thomson SA
9 further objects to providing documents or information subject to a confidentiality agreement or
10 other restrictions or to a protective order entered in another action or proceeding, except in
11 accordance with such confidentiality agreements, restrictions, or protective orders.

12 9. Thomson SA objects to any request, definition, or instruction that calls for the
13 disclosure of documents or information that would violate the legitimate privacy rights and
14 expectations of Thomson SA employees, directors, officers, affiliates, or subsidiaries, both
15 current and former, or other individuals, to the extent that such privacy rights or expectations are
16 protected by law, contract, or public policy.

17 10. To the extent any request, definition, or instruction may be construed as requiring
18 Thomson SA to characterize documents or their contents or to speculate as to what documents
19 may or may not show, Thomson SA objects to such request, definition, or instruction as vague,
20 ambiguous, and calling for legal conclusions and speculation.

21 11. A response by Thomson SA that it will produce non-privileged documents that it
22 believes to be responsive to a particular request, if any, is not a representation that documents in
23 that category exist nor is such a response (or the production of any documents in a particular
24 category) a representation that Thomson SA adopts, accepts, affirms, or admits the assertions,
25 contentions, or definitions used or made in connection with the request.

26 12. Thomson SA objects to each and every request, definition, and instruction to the
27 extent that it purports to impose burdens upon Thomson SA that are not permitted by law, or
28 seeks to impose greater obligations than those imposed under the Federal Rules of Civil

1 Procedure, the Local Rules of the District Court of the Northern District of California, or any
2 order of the Court.

3 13. Thomson SA objects to each and every request, definition, and instruction to the
4 extent that it seeks documents or information the disclosure of which is prohibited by law,
5 regulation, court order, or other authority of the foreign jurisdiction in which the documents or
6 information are located, including, without limitation, Loi 80-538 du 16 juillet 1980 relative à la
7 communication de documents et renseignements d'ordre économique, commercial ou technique
8 à des personnes physiques ou morales étrangères [Law 80-538 of July 16, 1980 relating to the
9 disclosure of documents and information of an economic, commercial, or technical nature to
10 foreign natural and legal persons], JOURNAL OFFICIEL DE LA REPUBLIQUE FRANÇAISE [J.O.]
11 [OFFICIAL GAZETTE OF FRANCE], July 17, 1980, p. 1799; *Cour de cassation*, Criminal Chamber,
12 Dec. 12, 2007, no. 07-83228, *Christopher X*; Loi Informatique et Libertés Act N°78-17 of
13 January 6, 1978 [Law No. 78-17 of 6 January 1978 on data processing, data files, and individual
14 liberties]. Thomson SA further objects to the extent such request, definition, or instruction seeks
15 discovery in contravention of the principles of public policy or international comity.

16 14. Thomson SA objects to each and every request to the extent it seeks testimony or
17 information that is unduly burdensome to obtain. Thomson SA objects to each and every request
18 as unduly burdensome to the extent: (i) it seeks information not within the possession, custody,
19 control, or knowledge of Thomson SA or its current officers, directors, or employees; (ii) it
20 would require an unreasonable investigation on the part of Thomson SA; (iii) the discovery
21 sought is unreasonably cumulative or duplicative; or (iv) the information sought is obtainable
22 from some other source that is more convenient, less burdensome, or less expensive. Thomson
23 SA construes each request as requiring only a reasonable search of its files likely to contain
24 relevant or responsive information and a reasonable inquiry of Thomson SA employees likely to
25 have information relevant to the subject matter of this litigation.

26 15. Thomson SA objects to each and every request, definition, and instruction to the
27 extent it calls for the creation of documents or data compilations that do not exist or that are not
28 ordinarily kept in the normal course of business.

1 16. Thomson SA objects to each and every request, definition, and instruction to the
 2 extent it assumes disputed facts or legal conclusions. Thomson SA hereby denies any disputed
 3 facts or legal conclusions assumed by each request, definition, and instruction. Any response or
 4 objection herein is without prejudice to this objection and Thomson SA's right to dispute facts
 5 and legal conclusions assumed by the requests, definitions, and instructions.

6 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

7 **Request No. 1.**

8 Documents sufficient to show Your corporate structure or organization throughout the
 9 Relevant Period, including, but not limited to, departments, divisions, parents, subsidiaries, joint
 10 ventures, Affiliated Entities, or other sub-units that were engaged during any part of the Relevant
 11 Period in the manufacture, marketing, sale or distribution of CRT in the United States, including,
 12 where applicable, the percentage of any stock or other interests owned by each entity in the
 13 chain.

14 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
 15 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
 16 privileged or protected documents or information, including, without limitation, documents or
 17 information subject to the attorney-client privilege, common-interest privilege, work-product
 18 doctrine, joint defense privilege, and/or any other privilege or protection. Thomson SA also
 19 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
 20 and seeks documents and information that are neither relevant to any claims or defenses in this
 21 litigation nor reasonably calculated to lead to the discovery of admissible evidence, including,
 22 without limitation, information as to Thomson SA's non-CRT operations. Thomson SA further
 23 objects to this request to the extent it calls for the creation of documents or data compilations that
 24 do not exist or are not ordinarily kept in the normal course of business. Thomson SA objects to
 25 this request because Plaintiffs' use of the phrase "Affiliated Entities" attempts to impose an
 26 obligation on Thomson SA to produce documents that are not in its possession, custody, or
 27 control. Thomson SA also objects to this request to the extent it seeks information or documents
 28 in the possession, custody, or control of Plaintiffs, or that are equally or more readily available to

1 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
 2 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
 3 products containing CRTs outside of the United States and unrelated to United States commerce
 4 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
 5 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
 6 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
 7 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
 8 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
 9 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
 10 located, including, without limitation, the laws of France set forth in General Objection No. 13.
 11 Finally, Thomson SA objects to this request to the extent it is duplicative of or unreasonably
 12 cumulative to other discovery produced in this action.

13 Subject to and without limiting each of these objections, Thomson SA will produce non-
 14 privileged, responsive documents located in the course of a reasonable search to the extent such
 15 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
 16 documents are located, including, without limitation, the laws of France set forth in General
 17 Objection No. 13.

18 **Request No. 2.**

19 As to each of Your divisions, subdivisions, departments, units, subsidiaries, parents,
 20 Affiliated Entities and joint ventures, Documents sufficient to identify each executive or
 21 Employee with managerial authority who had responsibilities or duties with respect to each of
 22 the following:

- 23 (a) the manufacturing or production of CRTs;
- 24 (b) the marketing of CRTs;
- 25 (c) the pricing of CRTs;
- 26 (d) the sale or distribution of CRTs;
- 27 (e) maintaining any electronic database(s), including archives, of e-mail or other
 28 electronic Documents relating to CRTs.

1 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
2 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
3 privileged or immune documents or information, including, without limitation, documents or
4 information subject to the attorney-client privilege, common-interest privilege, work-product
5 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
6 objects that the phrases “responsibilities or duties” and “managerial authority” are vague and
7 ambiguous in the context of this request and its subparts. Thomson SA also objects to this
8 request on the grounds that it is overbroad, unduly burdensome, and oppressive, and seeks
9 documents and information that are neither relevant to any claims or defenses in this litigation
10 nor reasonably calculated to lead to the discovery of admissible evidence. Thomson SA objects
11 to this request because Plaintiffs’ use of the phrase “Affiliated Entities” attempts to impose an
12 obligation on Thomson SA to produce documents that are not in its possession, custody, or
13 control. Thomson SA further objects to this request to the extent it calls for the creation of
14 documents or data compilations that do not exist or are not ordinarily kept in the normal course
15 of business. Thomson SA also objects to this request to the extent it seeks information or
16 documents in the possession, custody, or control of Plaintiffs, or that are equally or more readily
17 available to Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further
18 objects to this request to the extent it seeks the discovery of information regarding the sale of
19 CRTs or finished products containing CRTs outside of the United States and unrelated to United
20 States commerce on the grounds that it is overbroad, unduly burdensome, irrelevant, and not
21 reasonably calculated to lead to the discovery of admissible evidence. Such sales are beyond the
22 scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United
23 States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this
24 request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it
25 would violate the laws of the foreign jurisdiction(s) in which the information and/or documents
26 are located, including, without limitation, the laws of France set forth in General Objection No.
27 13. Finally, Thomson SA objects to this request to the extent it is duplicative of or unreasonably
28 cumulative to other discovery produced in this action.

1 Subject to and without limiting each of these objections, Thomson SA will produce non-
2 privileged, responsive documents located in the course of a reasonable search to the extent such
3 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
4 documents are located, including, without limitation, the laws of France set forth in General
5 Objection No. 13.

6 **Request No. 3.**

7 All Documents relating to Communications regarding CRTs between or among
8 manufacturers of CRTs, including Defendants.

9 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
10 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
11 privileged or immune documents or information, including, without limitation, documents or
12 information subject to the attorney-client privilege, common-interest privilege, work-product
13 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
14 objects that this request is vague and ambiguous, including, without limitation, as to the phrases
15 "relating to any Communication" and "You and any other manufacturer of CRTs" as used in this
16 request. Thomson SA also objects to this request to the extent it seeks documents or information
17 regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on
18 the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is
19 neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to
20 the discovery of admissible evidence. Thomson SA further objects to this request to the extent it
21 calls for the creation of documents or data compilations that do not exist or are not ordinarily
22 kept in the normal course of business. Thomson SA also objects to this request to the extent it
23 seeks information or documents in the possession, custody, or control of Plaintiffs, or that are
24 equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
25 Thomson SA further objects to this request to the extent it seeks the discovery of information
26 regarding the sale of CRTs or finished products containing CRTs outside of the United States
27 and unrelated to United States commerce on the grounds that it is overbroad, unduly
28 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible

evidence. Such sales are beyond the scope of this litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive, and seeks documents and information that are neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without limiting each of these objections, Thomson SA will produce non-privileged, responsive documents located in the course of a reasonable search to the extent such production will not violate the laws of the foreign jurisdiction(s) in which the information and/or documents are located, including, without limitation, the laws of France set forth in General Objection No. 13.

Request No. 4.

All Documents relating to any Communication between You (or any other Defendant or Co-conspirator) and any other manufacturer of CRTs concerning, relating to, and/or mentioning the production, marketing, pricing, distribution, inventory levels or sale of CRTs.

RESPONSE: In addition to its General Objections, incorporated by this reference as though fully set forth herein, Thomson SA objects to this request to the extent that it seeks privileged or immune documents or information, including, without limitation, documents or information subject to the attorney-client privilege, common-interest privilege, work-product doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further objects that this request is vague and ambiguous, including, without limitation, as to the phrases “relating to any Communication” and “You and any other manufacturer of CRTs” as used in this request. Thomson SA also objects to this request to the extent it seeks documents or information regarding conduct outside the applicable statute(s) of limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks information that is

1 neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to
2 the discovery of admissible evidence. Thomson SA further objects to this request to the extent it
3 calls for the creation of documents or data compilations that do not exist or are not ordinarily
4 kept in the normal course of business. Thomson SA also objects to this request to the extent it
5 seeks information or documents in the possession, custody, or control of Plaintiffs, or that are
6 equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
7 Thomson SA further objects to this request to the extent it seeks the discovery of information
8 regarding the sale of CRTs or finished products containing CRTs outside of the United States
9 and unrelated to United States commerce on the grounds that it is overbroad, unduly
10 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
11 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
12 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the
13 laws of any State. Thomson SA objects to this request to the extent that disclosure to Plaintiffs
14 of information and/or documents responsive to it would violate the laws of the foreign
15 jurisdiction(s) in which the information and/or documents are located, including, without
16 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
17 objects to this request on the grounds that it is overbroad, unduly burdensome, and oppressive,
18 and seeks documents and information that are neither relevant to any claims or defenses in this
19 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

20 Subject to and without limiting each of these objections, Thomson SA will produce non-
21 privileged, responsive documents located in the course of a reasonable search to the extent such
22 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
23 documents are located, including, without limitation, the laws of France set forth in General
24 Objection No. 13.

25 **Request No. 5.**

26 All Documents relating to any Meeting attended by You or any other Defendant or any
27 manufacturer of CRTs during which there was any Communication concerning the production,
28

1 marketing, pricing, distribution, inventory levels or sale of CRTs, including, but not limited to,
2 the notes of any such Meetings.

3 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
4 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
5 privileged or immune documents or information, including, without limitation, documents or
6 information subject to the attorney-client privilege, common-interest privilege, work-product
7 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA further
8 objects that this request is vague and ambiguous, including, without limitation, as to the phrase
9 “relating to any meeting” as used in this request. Thomson SA also objects to this request to the
10 extent it seeks documents or information regarding conduct outside the applicable statute(s) of
11 limitations and/or continuing to present on the grounds that it is overbroad, unduly burdensome,
12 oppressive, and seeks information that is neither relevant to any claims or defenses in this
13 litigation nor reasonably calculated to lead to the discovery of admissible evidence. Thomson
14 SA further objects to this request to the extent it calls for the creation of documents or data
15 compilations that do not exist or are not ordinarily kept in the normal course of business.
16 Thomson SA also objects to this request to the extent it seeks information or documents in the
17 possession, custody, or control of Plaintiffs, or that are equally or more readily available to
18 Plaintiffs from other Defendants, third parties, or otherwise. Thomson SA further objects to this
19 request to the extent it seeks the discovery of information regarding the sale of CRTs or finished
20 products containing CRTs outside of the United States and unrelated to United States commerce
21 on the grounds that it is overbroad, unduly burdensome, irrelevant, and not reasonably calculated
22 to lead to the discovery of admissible evidence. Such sales are beyond the scope of this
23 litigation, outside the subject-matter jurisdiction of the antitrust laws of the United States, and
24 beyond the jurisdiction or reach of the laws of any State. Thomson SA objects to this request to
25 the extent that disclosure to Plaintiffs of information and/or documents responsive to it would
26 violate the laws of the foreign jurisdiction(s) in which the information and/or documents are
27 located, including, without limitation, the laws of France set forth in General Objection No. 13.
28 Finally, Thomson SA objects to this request on the grounds that it is overbroad, unduly

1 burdensome, and oppressive, and seeks documents and information that are neither relevant to
 2 any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of
 3 admissible evidence.

4 Subject to and without limiting each of these objections, Thomson SA will produce non-
 5 privileged, responsive documents located in the course of a reasonable search to the extent such
 6 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
 7 documents are located, including, without limitation, the laws of France set forth in General
 8 Objection No. 13.

9 **Request No. 6.**

10 For each of Your Employees who has or had any non-clerical responsibility for
 11 recommending, reviewing, setting or approving prices, price increase announcements, bids or
 12 quotes for the sale of CRTs, or any other involvement in the marketing or sale of CRTs:

- 13 (a) all copies of electronic and manual diaries, calendars, appointment books, "to do"
 14 lists, day timers or appointment notes;
- 15 (b) all copies of trip and travel logs, records or other supporting Documents;
- 16 (c) all copies of expense reports or other supporting Documents;
- 17 (d) all copies of telephone number logs, directories, notebooks, Rolodex cards or related
 18 memoranda;
- 19 (e) all bills, statements, records and supporting Documents concerning long distance or
 20 cellular telephone calls;
- 21 (f) all Documents relating to membership in any trade association or industry group; and
- 22 (g) the complete personnel file for that Employee.

23 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
 24 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
 25 privileged or immune documents or information, including, without limitation, documents or
 26 information subject to the attorney-client privilege, common-interest privilege, work-product
 27 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also
 28 objects to this request to the extent it would violate the legitimate privacy rights and expectations

1 of Thomson SA employees, directors, officers, affiliates, or subsidiaries, both current and
2 former, or other individuals. Thomson SA further objects that this request is vague and
3 ambiguous, including, without limitation, as to the phrase "non-clerical responsibility" as used in
4 this request. Thomson SA also objects to this request to the extent it seeks documents or
5 information regarding conduct outside the applicable statute(s) of limitations and/or continuing
6 to present on the grounds that it is overbroad, unduly burdensome, oppressive, and seeks
7 information that is neither relevant to any claims or defenses in this litigation nor reasonably
8 calculated to lead to the discovery of admissible evidence. Thomson SA further objects to this
9 request to the extent it calls for the creation of documents or data compilations that do not exist
10 or are not ordinarily kept in the normal course of business. Thomson SA also objects to this
11 request to the extent it seeks information or documents in the possession, custody, or control of
12 Plaintiffs, or that are equally or more readily available to Plaintiffs from other Defendants, third
13 parties, or otherwise. Thomson SA further objects to this request to the extent it seeks the
14 discovery of information regarding the sale of CRTs or finished products containing CRTs
15 outside of the United States and unrelated to United States commerce on the grounds that it is
16 overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery
17 of admissible evidence. Such sales are beyond the scope of this litigation, outside the subject-
18 matter jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach
19 of the laws of any State. Thomson SA objects to this request to the extent that disclosure to
20 Plaintiffs of information and/or documents responsive to it would violate the laws of the foreign
21 jurisdiction(s) in which the information and/or documents are located, including, without
22 limitation, the laws of France set forth in General Objection No. 13. Finally, Thomson SA
23 objects to this request on the grounds that it is compound, overbroad, unduly burdensome, and
24 oppressive, and seeks documents and information that are neither relevant to any claims or
25 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
26 evidence.

27 Subject to and without limiting each of these objections, Thomson SA will produce non-
28 privileged, responsive documents located in the course of a reasonable search to the extent such

1 production will not violate the laws of the foreign jurisdiction(s) in which the information and/or
2 documents are located, including, without limitation, the laws of France set forth in General
3 Objection No. 13.

4 **Request No. 7.**

5 Documents sufficient to show the name and address of each trade association (including
6 committees and subcommittees) relating to CRTs of which You or any of Your Employees are or
7 have been a member, as well as Documents sufficient to show dates of membership and dates of
8 participation in committees or subcommittees.

9 **RESPONSE:** In addition to its General Objections, incorporated by this reference as
10 though fully set forth herein, Thomson SA objects to this request to the extent that it seeks
11 privileged or immune documents or information, including, without limitation, documents or
12 information subject to the attorney-client privilege, common-interest privilege, work-product
13 doctrine, joint defense privilege, and/or any other privilege or immunity. Thomson SA also
14 objects to this request to the extent it seeks documents or information regarding conduct outside
15 the applicable statute(s) of limitations and/or continuing to present on the grounds that it is
16 overbroad as to time, unduly burdensome, oppressive, and seeks information that is neither
17 relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the
18 discovery of admissible evidence. Thomson SA further objects to this request to the extent it
19 calls for the creation of documents or data compilations that do not exist or are not ordinarily
20 kept in the normal course of business. Thomson SA also objects to this request to the extent it
21 seeks information or documents in the possession, custody, or control of Plaintiffs, or that are
22 equally or more readily available to Plaintiffs from other Defendants, third parties, or otherwise.
23 Thomson SA further objects to this request to the extent it seeks the discovery of information
24 regarding the sale of CRTs or finished products containing CRTs outside of the United States
25 and unrelated to United States commerce on the grounds that it is overbroad, unduly
26 burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible
27 evidence. Such sales are beyond the scope of this litigation, outside the subject-matter
28 jurisdiction of the antitrust laws of the United States, and beyond the jurisdiction or reach of the

1
2 Dated: May 14, 2014

/s/ Kathy L. Osborn

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

No. 07-cv-5944-SC

MDL No. 1917

This Document Relates to:

CERTIFICATE OF SERVICE

*Sharp Electronics Corp., et al. v. Hitachi Ltd.,
 et al.*, No. 13-cv-1173;

*Electrograph Systems, Inc., et al. v. Technicolor
 SA, et al.*, No. 13-cv-05724;

Siegel v. Technicolor SA, et al., No. 13-cv-
 05261;

*Best Buy Co., Inc., et al. v. Technicolor SA, et
 al.*, No. 13-cv-05264;

Target Corp. v. Technicolor SA, et al., No. 13-cv-05686;

Interbond Corporation of America v. Technicolor SA, et al., No. 13-cv-05727;

Office Depot, Inc. v. Technicolor SA, et al., No. 13-cv-05726;

Costco Wholesale Corporation v. Technicolor SA, et al., No. 13-cv-05723;

P.C. Richard & Son Long Island Corporation, et al. v. Technicolor SA, et al., No. 13-cv-05725;

Schultze Agency Services, LLC v. Technicolor SA, et al., No. 13-cv-05668;

Sears, Roebuck and Co. and Kmart Corp. v. Technicolor SA, et al., No. 13-cv-05262;

Tech Data Corp., et al. v. Hitachi Ltd., et al., No. 13-cv-00157.

I HEREBY CERTIFY that a true and correct copy of Thomson SA's Responses to Direct Action Plaintiffs' First Set of Requests for Production of Documents was served by email to each of the following addressees listed below.

Dated: May 14, 2014

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